ery" without the intervention of the common carrier as an agent of collection. See *Skinner and Kennedy Stationery Co.* v. *Lammert Furniture Co.*, 182 Mo. App. 549; *Boyd* v. *Bank of Mercer County, supra.* Commercial usage and the courts seem to have well established this line of cleavage in apparently analogous cases. The matter is discussed by Henderson, J., in *Keller* v. *State* (Tex.) 87 S. W. 669, who comments on the restriction of the meaning of "C. O. D." to small packages sent by common carrier, and says that the doctrines of the two types of cases are too well established to change either to conform to the other. The use of the term "cash sale" instead of "cash on delivery" where the transaction is between the parties themselves, would remove much of the mist in which the subject is enveloped.

SCHOOLS AND SCHOOL DISTRICTS—FORBIDDING PUPIL'S ATTENDANCE AT MOVING PICTURES.—The governing authorities of a public school established a rule prohibiting the attendance by pupils at any show, moving picture show or social function on any school night, excepting Friday night. Certain pupils, with the consent of their parents, violated the rule by attending a moving picture show on one of the forbidden nights, and were threatened with expulsion unless they and their parents should agree to observe the regulation in the future. The parents filed a petition for an injunction against the proposed enforcement of the rule. *Held,* the injunction should be denied, the rule relating to attendance at moving picture shows being a reasonable exercise of the school board's discretionary power of discipline. *Mangum et al.* v. *Keith,* (Ga., 1918), 95 S. E. 1.

The power of school authorities over pupils is not confined to the school room or school grounds, but may affect their conduct after they have reached home. MECHEM, PUBLIC OFFICERS, § 730. The extent to which their regulations may go is subject to some conflict. Thus, it has been held that a school board has power to exclude a child of immoral and licentious character, although such character is not manifested by any acts within the school, *Sherman* v. *Inhabitants of Charlestown,* 8 Cush. 160; and that a pupil may be expelled for drunkenness, though not guilty of any misconduct on the school grounds. *Douglass* v. *Campbell,* 89 Ark. 254. Rules forbidding membership in secret societies have been upheld. *Wayland* v. *Hughes, et al,* 43 Wash. 441; *Wilson* v. *Board of Education of Chicago,* 233 Ill. 464. See note, 5 MICH. L. REV. 69. On the other hand, a rule that no pupil should attend a social function during the school term was held to be beyond the school board's power, *Dritt* v. *Snodgrass,* 66 Mo. 286; and a rule requiring all pupils to remain at home and study from seven to nine o'clock on school nights was held to be an unwarranted invasion of parental rights to the control of children. *Hobbs* v. *Germany,* 94 Miss. 469. These cases limit the power of school authorities in making regulations to control the child after it has reached home to matters which would *per se* have a direct and pernicious effect on the moral tone of the school, or have a tendency to subvert the proper administration of school affairs. This limitation seems to be well supported by authority, but the court in the instant case has evidently not seen fit to adhere to it.